

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
RAMIZ ZIJAD HODZIC,)
a/k/a Siki Ramiz Hodzic,)
SEDINA UNKIC HODZIC,)
NIHAD ROSIC,)
a/k/a Yahya AbuAyesha Mudzahid,)
MEDIHA MEDY SALKICEVIC,)
a/k/a Medy Ummuluna,)
a/k/a Bosna Mexico, and)
ARMIN HARCEVIC)
Defendants.)

No. 4:15 CR 00049 CDP/DDN

**GOVERNMENT'S MOTION FOR LEAVE TO FILE RESPONSE IN EXCESS OF
PAGE LIMITATION**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake, Howard Marcus, and Kenneth Tihen, Assistant United States Attorneys for said District, Mara Kohn and Joshua Champagne, Trial Attorneys for the United States Department of Justice, National Security Division, Counterterrorism Section, and submit the following Motion For Leave To Exceed Page Limit, states, as follows:

The Government requests leave of court to file its Response to the captioned defendants' Motions to Dismiss. Each of the five defendants filed a separate Motion to Dismiss and

accompanying Memorandum in support.¹ Taken together, the defendants' motions and memorandum comprise 77 pages. The Government has prepared one response to the defendant's respective motions.

In the Eastern District of Missouri, Local Rule 4.01(D) provides that “[n]o party shall file any motion, memorandum or brief which exceeds fifteen (15) numbered pages, exclusive of the signature page and attachments, without leave of Court.” In order to respond properly and effectively respond to the defendants five Motions to Dismiss, the Government believes it is necessary to file its response in excess of the page limitation. This is due to the nature of the underlying case and the number and complexity of the arguments raised by the defendants collectively.

WHEREFORE, the Government respectfully requests leave of court to file a 38 page Response to the defendants' Motions to Dismiss which is in excess of the 15 page limit imposed by local rule.

¹ See Defendant Ramiz Hodzic (Doc. 236 and 237), Defendant Sedina Hodzic (Doc. #223 and 224), Defendant Salkicevic (Doc. # 230 and 231), Defendant Rosic (Doc. # 225 and 227) and Defendant Harcevic (Doc. # 208 and 212). The Court previously granted Defendant Harcevic's Motion to file in excess of the page limitation (ECF # 211).

Respectfully Submitted,
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/s/ Matthew T. Drake _____

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

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